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August 25, 2016

VIA ECF and E-mail

Honorable Kimba M. Wood
Senior United States District Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Williams, Steven Brown, Gerald Seppala.*
Docket No. S3 16 Cr. 436 (KMW)

**Letter Application To Extend Travel Restriction Bail Conditions And
For The Court's Permission To Defendant Brown for European Travel**

Dear Judge Wood:

I write again as the attorney for defendant Steven J. Brown now seeking expansion of his travel restrictions so as to include travel throughout the continental United States and, in addition, I seek for Mr. Brown the Court's permission for a European trip primarily for business purposes.

With respect to this modification regarding continental United States travel expansion, I can represent that I have the consent of both Assistant United States Attorney Patrick Egan and the assigned Pretrial Services Officers, Matthew Carter and Natasha Ramesar. Of course, Mr. Brown would be expected to provide all pertinent travel information to Pretrial Services beforehand, a habit of his that I have every reason to believe Mr. Brown continues to do routinely and satisfactorily.

Furthermore, and as directed by the Court in its Memorandum Endorsement of August 2, 2016 concerning my earlier request regarding this trip, I seek the Court's permission for an

expansion
to travel
within
the U.S.
is granted
KMW

Honorable Kimba M. Wood

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international European trip beginning on or about September 8th for up to ten days focused on Mr. Brown's ongoing business interests. His travel would include England, France, Spain and the Czech Republic. His business activities and duties would comprise site selection, contract closing, casting, scouting, screening, promotional and filming obligations for movies such as "Ghoul", "Kajinek", "Warriors in Prague", "Kidnap", "Dance Angels", and a potential action film involving a major cinema star. Also of great importance to Mr. and Mrs. Brown is the scheduled christening of his Goddaughter in France near St. Remy on September 10th and his attendance at his wife's birthday on September 13th, also in France.

As before, with respect to this latter international travel request, Pretrial Services customarily takes no position and AUSA Egan opposes such for reasons previously argued that Mr. Brown is a flight risk. We counter that Mr. Brown has been scrupulous in his compliance and accountability with all his travel and especially so with his prior European trip that Your Honor permitted.

All of the aforesaid international travel is represented by the defendant as essential to maintaining his employment and its continuation other than the short visit for the christening and his wife's birthday celebration amongst her French family. Mr. Brown will comply, of course, with the travel information requirements of his Pretrial Services Officers.

Please feel free to raise any questions or concerns.

Thank you for your consideration of this request.

Respectfully submitted,



Walter Mack

cc: AUSA Patrick Egan (by ECF and email)
PTSO Matthew Carter (by email)
PTSO Natasha Ramesar (by email)

The court denies permission to leave the United States, given the risk of flight, unless defendant makes a stronger showing of need to travel to Europe. Defendant must respond to the Government's list of completed projects by September 13, 2016.

SO ORDERED: N.Y., N.Y. 9-6-16

Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.